

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JANE DOE 1 <i>et al.</i> , Plaintiffs, v. GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS, <i>et al.</i> , Defendants.	Case Number: 23-cv-10301-AS
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**CECILE DE JONGH’S NOTICE OF JOINDER WITH/INCORPORATION OF
JOHN DE JONGH’S AND UNITED STATES VIRGIN ISLANDS’ OPPOSITIONS
TO PLAINTIFFS’ RULE 54 MOTION**

Cecile de Jongh, by and through undersigned counsel, hereby joins in and incorporates in her Opposition to Plaintiffs’ Motion for Judgment Pursuant to Rule 54(b) (ECF No. 205) (“Motion”) all arguments raised by John de Jongh and/or the United States Virgin Islands in their respective oppositions and any materials in support thereof, to the extent those arguments are applicable to Ms. de Jongh, are not already raised in her own Opposition, and/or to the extent they either further brief and expand upon grounds already raised in her Opposition or raise new grounds for denial of the Motion that apply to Ms. de Jongh. In support of this notice, Ms. de Jongh notes that the points and authorities raised in Mr. de Jongh’s opposition, and those that she expects may be raised in USVI’s, likewise apply to her and therefore joinder will aid judicial economy and efficiency in resolving Plaintiffs’ Motion. Ms. de Jongh respectfully reserves the right to further join and incorporate future arguments by Mr. de Jongh and/or USVI.

DATED: May 1, 2025

Respectfully submitted,

/s/

Amelia J. Schmidt (NYS Bar 4947131)
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